



State of Utah

Department of
Environmental Quality

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Executive Director

DIVISION OF AIR QUALITY
Richard W. Sprott
Director

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Lieutenant Governor

DAQE-IN0181005-04

August 10, 2004

Eston Kimber, Manager
CSI Acquisition Corporation
D.B.A. Companion Systems Incorporated
645 West 200 North
North Salt Lake, Utah 84054

Dear Mr. Kimber:

Re: Intent to Approve: Modify Approval Order DAQE-198-02 to Change Adhesive Booth to Paint Booth, Davis County – CDS SM; MAINT: HAPs
Project Code: N0181-005

The attached document is the Intent to Approve (ITA) for the above-referenced project. ITAs are subject to public review. Any comments received shall be considered before an Approval Order is issued.

Future correspondence on this Intent to Approve should include the engineer's name as well as the DAQE number as shown on the upper right-hand corner of this letter. Please direct any technical questions you may have on this project to Mr. Nando Meli. He may be reached at (801) 536-4052.

Sincerely,

Rusty Ruby, Manager
New Source Review Section

RR:NM:re

cc: Davis County Health Department
Mike Owens, EPA Region VIII

STATE OF UTAH

Department of Environmental Quality

Division of Air Quality

**INTENT TO APPROVE: MODIFICATION OF APPROVAL
ORDER DAQE 198-02, TO CHANGE ADHESIVE BOOTH TO
PAINT BOOTH**

**Prepared By: Nando Meli, Engineer
(801) 536-4052
Email: nmeli@utah.gov.**

INTENT TO APPROVE NUMBER

DAQE-IN0181005-04

Date: August 10, 2004

Companion Systems Incorporated

**Source Contact
Eston Kimber
(801) 936-8082
ext. 316**

**Richard W. Sprott
Executive Secretary
Utah Air Quality Board**

Abstract

Companion Systems, Inc. produces enclosures for automatic bank teller machines. The source is located in North Salt Lake City, Davis County. Davis County is a maintenance area of the National Ambient Air Quality Standards (NAAQS) for ozone and an attainment area for all other pollutants. The source has proposed to use the adhesive booth as a paint booth. Currently the adhesive booth uses bank style filters and Companion Systems has requested approval to use styro baffle filters as they currently use in their other paint booths. New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP), Maximum Available Control Technology (MACT) regulations, and Title V of the 1990 Clean Air Act do not apply to this source. The emissions, in tons per year, will remain the same as in the AO (DAQE-198-02 dated March 19, 2002): PM₁₀ 3.16, NO_x 0.28, CO 0.20, VOC 16.97, and HAPs 17.00.

The Notice of Intent (NOI) for the above-referenced project has been evaluated and has been found to be consistent with the requirements of the Utah Administrative Code Rule 307 (UAC R307). Air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an Approval Order (AO) by the Executive Secretary of the Utah Air Quality Board.

A 30-day public comment period will be held in accordance with UAC R307-401-4. A notice of intent to approve will be published in the Salt Lake Tribune and Deseret News on August 13, 2004. During the public comment period the proposal and the evaluation of its impact on air quality will be available for both you and the public to review and comment. If anyone so requests a public hearing it will be held in accordance with UAC R307-401-4. The hearing will be held as close as practicable to the location of the source. Any comments received during the public comment period and the hearing will be evaluated.

Please review the proposed AO conditions during this period and make any comments you may have. The proposed conditions of the AO may be changed as a result of the comments received. Unless changed, the AO will be based upon the following conditions:

General Conditions:

1. This Approval Order (AO) applies to the following company:

Site and Corporate Office Location

CSI Acquisition Corporation
D.B.A. Companion Systems, Inc.
645 West 200 North
North Salt Lake City, UT 84054

Phone Number (801) 936-8082

Fax Number (801) 936-1563

The equipment listed in this AO shall be operated at the following location:

645 West 200 North
North Salt Lake City, UT 84054, Davis County

Universal Transverse Mercator (UTM) Coordinate System: UTM Datum NAD27
4,521.803 kilometers Northing; 422.935 kilometers Easting; Zone 12

2. All definitions, terms, abbreviations, and references used in this AO conform to those used in the Utah Administrative Code (UAC) Rule 307 (R307) and Title 40 of the Code of Federal Regulations (40 CFR). Unless noted otherwise, references cited in these AO conditions refer to those rules.
3. The limits set forth in this AO shall not be exceeded without prior approval in accordance with R307-401.
4. Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved in accordance with R307-401-1.
5. All records referenced in this AO which are required to be kept by the owner/operator, shall be made available to the Executive Secretary or Executive Secretary's representative upon request, and the records shall include the two-year period prior to the date of the request. Records shall be kept for the following minimum periods:
 - A. Emission inventories Five years from the due date of each emission statement or until the next inventory is due, whichever is longer.
 - B. All other records Two years
6. Companion Systems, Inc. shall install the baffle filters in the South paint booth, and shall conduct its operations to manufacture enclosures for automatic bank teller machines in accordance with the terms and conditions of this AO, which was written pursuant to Companion Systems's Notice of Intent submitted to the Division of Air Quality (DAQ) on July 16, 2004.
7. This AO shall replace the AO (DAQE-198-02) dated March 19, 2002.
8. The approved installations shall consist of the following equipment or equivalent*:
 - A. Tooling Gelcoat Booth

Equipment:	Air, airless/air assist and HVLP spray guns
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 - B. Tooling Laminating Area

Area Dimensions**:	36' x 32' x 15', separated from the Pattern and Tooling shops by two overhead doors
Equipment:	One internal mix airless chop gun; One spray gun
 - C. 1 - Product Fabrication Gelcoating - three stalls

Equipment:	Venus-Gusmer Gel Coat Gun Airless/Air Assist spray guns
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- D. Product Fabrication Area - Barrier Coat and Lamination
- Area Dimensions**: 42' x 20' x 12'
- Equipment: One Flow Coat Chop Gun
One internal mix gun
One spray gun and
One Internal Mix Resin Transfer Molding (RTM) system.
- E. Production Grinding - three booths, Mold Removal, Cleanup and Assembly
- Booth Dimensions**: 17' x 13' x 10'
- Dust Collector
- Manufacturer/Model: Torit DFT 4-32 Downflo II
- F. North Paint Booths (five booths)
- Booth Dimensions**: Each booth @ 18' x 12' x 10'
- Equipment: Air, airless/air assist and HVLP spray guns
- G. South Paint Booths (four booths)
- Booth Dimensions**: Each booth @ 18' x 12' x 10'
- Equipment: Air, airless/air assist and HVLP spray guns
- H. Acetone Recycling (see the NOI dated November 25, 1997 for detailed technical data)
- I. Northeast Paint Booth
- Booth Dimensions**: 12' x 15' x 24' overall
- Equipment: Spray gun: HVLP and airless/air assist
- J. South Paint Booth
- Booth Dimensions**: 12' x 15' x 24' overall
- Equipment: Spray gun: HVLP and airless/air assist
- K. Three enclosed automatic spray gun cleaners located in North Paint Booth area, Northeast Paint Booth area, and South Paint Booth area:
- Manufacturer: Hercules
- Tank capacity: Acetone, 5 gallons
- L. Four closed dip tanks located in Tooling Gelcoat Booth, Tooling Laminating area, Production Gelcoat Booths, and Production Laminating area:
- Tank Capacity: 5 gallons

* Equivalency shall be determined by the Executive Secretary.

** This equipment is listed for informational purposes only.

9. The Pattern Shop HPT Baghouse shall vent back into the building.
10. The Torit Dust Collector shall vent back into the building.
11. All other filters installed in the work areas in 8.A through 8.D and 8.F through 8.J shall control process streams from their respective processes. All exhaust air from the work areas shall be routed through their respective filters before being vented to the atmosphere. The filters shall be maintained and replaced in accordance with manufacturer's recommendations or instructions.
12. Companion Systems shall notify the Executive Secretary in writing when the installation of the equipment listed in Condition #8.J. has been completed and is operational, as an initial compliance inspection is required. To insure proper credit when notifying the Executive Secretary, send your correspondence to the Executive Secretary, attn: Compliance Section.

If installation has not been completed within eighteen months from the date of this AO, the Executive Secretary shall be notified in writing on the status of the installation. At that time, the Executive Secretary shall require documentation of the installation of the operation and may revoke the AO in accordance with R307-401-11.

Limitations and Tests Procedures

13. Visible emissions from the following emission points shall not exceed the following values:
 - A. All filters and dust collectors - 10% opacity
 - B. All paint booths - 10% opacity

Opacity observations of emissions from stationary sources shall be conducted according to 40 CFR 60, Appendix A, Method 9.

14. The following production limits shall not be exceeded:
 - A. 20 hours per calendar day and 260 days per rolling 12-month period for Mold fabrication.
 - B. 20 hours per calendar day and 260 days per rolling 12-month period for Production Gelcoat.
 - C. 20 hours per calendar day and 260 days per rolling 12-month period for Barrier coat/ laminating.
 - D. 20 hours per calendar day and 260 days per rolling 12-month period for painting.

The owner/operator shall calculate a calendar day total by adding all operating hours from midnight to midnight. To determine compliance with a rolling 12-month total the owner/operator shall calculate a new 12-month total by the twentieth day of each month using data from the previous 12 months. Records of production shall be kept for all periods when the plant is in operation. Production shall be determined by operator records. The records of production shall be kept on a daily basis. Hours of operation shall be determined by supervisor monitoring and maintaining of an operations log.

Fuels

15. The owner/operator shall only use natural gas as a fuel.

Volatile Organic Compound (VOC) and Hazardous Air Pollutants (HAPs) Limitations

16. The VOC content of the paint as used in the booths shall not exceed 3.5 and 4.3 pounds per gallon for coating operations described in R307-340-9(3)(b)&(c) and coating operations described in R307-340-9(3)(a), respectively. High solids (low VOC content) paints shall not be thinned or otherwise reduced beyond manufacturers' recommendations. These parameters shall be tested if directed by the Executive Secretary using the appropriate ASTM method or another method approved by the Executive Secretary.
17. The plant-wide emissions of VOCs and HAPs from the paint booths, degreasers, contact cement applicators, etc. and associated operations shall not exceed:

16.97 tons per rolling 12-month period for VOCs including HAPs below
0.79 tons per rolling 12-month period for Dimethylphalate
0.27 tons per rolling 12-month period for Ethyl benzene
0.23 tons per rolling 12-month period for Glycol Ether
0.41 tons per rolling 12-month period for Hexane
0.05 tons per rolling 12-month period for Methanol
1.30 tons per rolling 12-month period for Methyl Ethyl Ketone
0.40 tons per rolling 12-month period for Methyl Methacrylate
0.12 tons per rolling 12-month period for Methylene Chloride
0.23 tons per rolling 12-month period for Methyl Isobutyl Ketone
8.62 tons per rolling 12-month period for Styrene
2.75 tons per rolling 12-month period for Toluene
1.77 tons per rolling 12-month period for Xylene
0.01 tons per rolling 12-month period for Cadmium Sulfide
0.01 tons per rolling 12-month period for Chromium compound
0.04 tons per rolling 12-month period for Lead Chromate

Compliance with each/the limitation shall be determined on a rolling 12-month total. Based on the twentieth day of each month, a new 12-month total shall be calculated using data from the previous 12 months.

The VOC and HAP emissions shall be determined by maintaining a record of VOC and HAP emitting materials used each month. The record shall include the following data for each material used:

- A. Name of the VOC and HAPs emitting material, such as: paint, adhesive, solvent, thinner, reducers, chemical compounds, toxics, isocyanates, etc.
- B. Density of each material used (pounds per gallon)
- C. Percent by weight of all VOC and HAP in each material used
- D. Gallons of each VOC and HAP emitting material used
- E. The amount of VOC and HAP emitted monthly by each material used shall be calculated by the following procedure:

$$\text{VOC} = \frac{\% \text{ VOC by Weight}}{(100)} \times [\text{Density } (\frac{\text{lb}}{\text{gal}})] \times \text{Gal Consumed} \times \frac{1 \text{ ton}}{2000 \text{ lb}}$$

$$\text{HAP} = \frac{\% \text{ HAP by Weight}}{(100)} \times [\text{Density } (\frac{\text{lb}}{\text{gal}})] \times \text{Gal Consumed} \times \frac{1 \text{ ton}}{2000 \text{ lb}}$$

- F. The amount of VOC or HAP emitted monthly from all materials used.
- G. The amount of VOCs or HAPs reclaimed for the month shall be similarly quantified and subtracted from the quantities calculated above to provide the monthly total VOC or HAP emissions.

Records & Miscellaneous

- 18. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this Approval Order including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Executive Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed on equipment authorized by this AO shall be recorded.
- 19. The owner/operator shall comply with R307-150 Series. Inventories, Testing and Monitoring.
- 20. The owner/operator shall comply with R307-107. General Requirements: Unavoidable Breakdowns.

The Executive Secretary shall be notified in writing if the company is sold or changes its name.

This AO in no way releases the owner or operator from any liability for compliance with all other applicable federal, state, and local regulations including R307.

A copy of the rules, regulations and/or attachments addressed in this AO may be obtained by contacting the Division of Air Quality. The Utah Administrative Code R307 rules used by DAQ, the Notice of Intent (NOI) guide, and other air quality documents and forms may also be obtained on the Internet at the following web site:

<http://www.airquality.utah.gov/>

The annual emissions estimations below include point source and fugitive emissions and do not include fugitive dust, road dust, tail pipe emissions and grandfathered emissions. These emissions are for the purpose of determining the applicability of Prevention of Significant Deterioration, non-attainment area, maintenance area, and Title V source requirements of the R307. They are not to be used for determining compliance.

The Potential To Emit (PTE) emissions for this source (the entire plant, or specify what portion) are currently calculated at the following values:

	<u>Pollutant</u>	<u>Tons/yr</u>
A.	PM ₁₀	3.16
B.	NO _x	0.28
C.	CO	0.20
D.	VOC	16.97
E.	HAPs	
	Cadmium Sulfide	0.01
	Chromium compound	0.01
	Dimethylphalate.....	0.79
	Ethyl benzene	0.27
	Glycol Ether.....	0.23
	Hexane	0.41
	Lead Chromate	0.04
	Methanol.....	0.05
	Methyl Ethyl Ketone	1.30
	Methyl Methacrylate.....	0.40
	Methylene Chloride	0.12
	Methyl Isobutyl Ketone	0.23
	Styrene	8.62
	Toluene	2.75
	Xylene.....	1.77
	Total HAPs	17.00

The Division of Air Quality is authorized to charge a fee for reimbursement of the actual costs incurred in the issuance of an AO. An invoice will follow upon issuance of the final Approval Order.

Sincerely,

Rusty Ruby, Manager
New Source Review Section